REMARKS/ARGUMENTS

Applicant graciously appreciates the Office's attention to the instant application. In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the pending claims of the instant application.

Applicant appreciates the Office's participation in a telephonic conference of January 3, 2006 where the November 1, 2005 Final Office Action was discussed. Applicant notes that the February 2, 2006 Final Office Action replaces the November 1, 2005 Final Office Action and thereby resets the timings for the statutory response periods. Applicant also notes that an Interview Summary was attached to the February 2, 2006 Final Office Action.

This response is believed to be fully responsive to all issues raised in the February 2, 2006 Final Office Action. Claims 1-7, 11, 12, 14, 16 and 18 are currently amended. Claims 1-18 are pending.

Interview Summary

The Interview Summary states: "Applicant mentioned the possibility of amending the claims to include a layer to accelerate hit testing and that sectors are not frames to further distinguish the definition of sectors over the prior art of record; moreover, a child could be in more than one sector".

Applicant clarifies as to sectors are not frames. In this regard, the sectors are not HTML frame elements (i.e., <FRAME>). As discussed below, for purposes of clarity, Applicant currently amends the sectors such that they are "linking sectors" to provide for linking operations (e.g., cursor linking or tracking, etc.).

In the Claims

Rejections under 35 U.S.C. §102(e): Gayraud et al.

In the Final Office Action mailed February 2, 2006, the Office

rejected claims 1-6 under §102(e) as being anticipated by Gayraud et al.,

US 6,005,570 ("Gayraud reference"). The Office discusses claim 2 and

then claims 1 and 3-6, as being similar in scope to the combination of

claims 9 and 10. Without acquiescing in this assessment, Applicant

discusses claim 2 followed by claims 1 and 3-6.

Under §102, a claim is anticipated "only if each and every element

as set forth in the claim is found, either expressly or inherently described, in

a single prior art reference" (MPEP §2131).

Claim 2

Claim 2, as currently amended, recites:

A method comprising:
       dividing a GUI parent, having GUI children, into <u>*cursor*</u>
<u>*linking sectors;*</u>
       mapping each of the GUI children to at least one of the
<u>*cursor linking sectors; and*</u>
       linking a cursor to one of the GUI children using the
mapping.

The Office states that the Gayraud reference discloses dividing a

GUI parent, having GUI children, into sectors at col. 8, lines 24-33:

> The client area may be divided into several smaller logical areas. By
> using "hit-testing"--determining where on the screen the user is
> pointing at with the cursor--a program may determine the current
> location of the cursor. In general, hit-testing involves calculations
> using the X- and Y-coordinates passed to a Windows window
> procedure (in the lParam parameter of the mouse message). Hit-
> testing is simplified through the use of "child windows." The child
> windows divide the entire client area into several smaller rectangular
> regions.

To help understand the Gayraud reference, a few more lines of the above paragraph are also presented (col. 8, lines 33-36):

> Each child window has its own window handle, window procedure, and client area. Each window procedure receives mouse messages that apply only to its child window.

Based on this evidence, the Gayraud reference discloses dividing a client area into smaller logical areas. Then, the Gayraud reference discloses that hit-testing is simplified through the use of "child windows". The Gayraud reference discloses that each child window has its own handle, procedure and client area and that "each window procedure receives mouse messages that apply only to its child window". As such, the Gayraud reference discloses dividing a client area into child windows.

In contrast, claim 2 recites *"dividing a GUI parent, having GUI children, into cursor linking sectors"*. Applicant submits that the Gayraud reference does not disclose such a GUI parent. In particular, the Gayraud reference does not disclose a GUI parent having GUI children where the GUI parent is divided into cursor linking sectors.

Claim 2 also recites *"mapping each of the GUI children to at least one of the cursor linking sectors"*. Thus, it is clear that claim 2 requires GUI children <u>and</u> cursor linking sectors; otherwise, mapping would not be possible. Consequently, Applicant asserts that the Gayraud reference does not disclose such cursor linking sectors.

For the foregoing reasons, Applicant submits that claim 2 is patentable over the Gayraud reference.

Claim 1

Claim 1 recites:
A method comprising:

> *dividing a GUI parent, having a GUI child, into cursor linking sectors;*
> *mapping the GUI child to at least one of the cursor linking sectors; and*
> *linking a cursor to the GUI child using the mapping.*

Claim 1 recites *"dividing a GUI parent, having a GUI child, into cursor linking sectors"*. Applicant submits that the Gayraud reference does not disclose such a GUI parent (see also evidence and arguments as to mapping).

Claim 3

Claim 3 recites *"dividing GUI parents into cursor linking sectors"*, *"mapping"* and *"linking a cursor to a GUI child"* using the mapping. Applicant submits that the Gayraud reference does not disclose the recited cursor linking sectors or the dividing, mapping or linking (see also evidence and arguments as to mapping).

Claim 4

Claim 4 recites *"dividing each GUI parent into cursor linking sectors"*, *"mapping"* and *"linking a cursor to a GUI child using the mapping"*. Applicant submits that the Gayraud reference does not disclose the recited cursor linking sectors or the dividing, mapping or linking (see also evidence and arguments as to mapping).

Claim 5

Claim 5 recites *"dividing each GUI parent into cursor linking sectors"*, *"mapping each GUI child to at least one of the cursor linking sectors"* and *"linking a cursor to a GUI child using the mapping"*. Applicant submits that the Gayraud reference does not disclose the recited

cursor linking sectors or the dividing, mapping or linking (see also evidence and arguments as to mapping).

Claim 6

Claim 6 recites:

A computer-readable medium storing computer-executable instructions to divide GUI items into cursor linking sectors; to create a map of the GUI items in relation to the sectors; and to link a cursor to a GUI item using the map.

Applicant submits that the Gayraud reference does not disclose the recited cursor linking sectors to link a cursor to a GUI item using the recited map.

Rejections under 35 U.S.C. §103(a): Gayraud in view of HTML document

The Office rejected claims 7-11 and 18 under 103 as being unpatentable over the Gayraud reference in view of the HTML 4 in a Week document (Chapters 12 (day 6) and 14 (day 7)), referred to herein as the HTML document.

Claims 7 and 8

Claim 7, as currently amended, recites:

A method comprising:

receiving a GUI comprising a GUI parent having GUI children, the GUI children having positions within the GUI parent; and

dividing the GUI parent into container level, linking sectors based on the positions of the GUI children within the GUI parent wherein the linking sectors provide for linking to the GUI parent and/or the GUI children..

To clarify further, Applicant currently amends to recite that the container level sectors are "container level, linking sectors" that "provide for linking to the GUI parent and/or the GUI children".

As stated in Applicant's last response, claim 7 requires a GUI parent, GUI children and sectors. In contrast, an HTML frame is typically a GUI parent or a GUI child. In other words, the Gayraud reference and the HTML document may disclose a GUI parent and a GUI child but they do not disclose the claimed "sectors".

The Office relies on Chapter 12 of the HTML document, which is entitled "Frames and Linked Windows". Chapter 12 includes a "Summary" (page 360), which states: "In this chapter, you learned how to link a document to a new or an existing window. In addition, you learned how to create framesets and link them together by using the tags listed in Table 12.3".

Referring to Table 12.3 at page 360 of the HTML document, Applicant submits that the disclosed HTML <FRAME> tag within an HTML <FRAMESET> tag within an HTML <BASE TARGET> tag are not and do not operate as the recited container level, linking sectors for linking to a GUI parent and/or its GUI children.

For at least the foregoing reasons, Applicant submits that claim 7 and dependent claim 8 are patentable over the Gayraud reference in view of the HTML document.

Claims 9

Claim 9 depends on claim 7 and recites: *The method of claim 7 further comprising mapping each of the GUI children to at least one of the sectors.*

Applicant respectfully directs the Office to the argument and evidence for claim 7 and submits that for at least this reason, claim 9 is patentable over the Gayraud reference in view of the HTML document.

With respect to mapping, the Office refers to Chapter 14 of the HTML document, which is entitled "Image Maps". Chapter 14 includes the heading "Creating a Map File" (page 403), which states "creating a map file involves sketching out the regions in your image that are clickable, determining the coordinates that define those regions, and deciding on the HTML pages where they should point." Such a map file relies on "regions, coordinates, and URLs" (page 405) where, in the sample map (NSCA HTTPd), the regions are specified as "circle", "poly", "rect" or "point", coordinates as x, y-coordinates and URLs as "/www/pencil.html", etc.

Thus, these maps simply define clickable regions that point to HTML pages through use of URLs. They do not map GUI children to the container level, linking sectors, per claim 9. For at least this reason, Applicant submits that claim 9 is patentable over the Gayraud reference in view of the HTML document.

Claim 10

Applicant respectfully directs the Office to the argument and evidence for claims 7 and 9 and submits that claim 10 is patentable over the Gayraud reference in view of the HTML document.

Claim 10 recites: *further comprising linking a cursor to one of the GUI children using the mapping.* Applicant submits that the Gayraud reference and the HTML document do not disclose such linking using the recited mapping. The map file of the HTML document (page 405) does not provide for linking a cursor to a GUI child. Instead, the map file is used to "map" a region in an HTML frame or base to a URL. Applicant submits that, in the HTML document, some other operation determines how to link

a cursor to this region and while the "map" can have a region order, this only determines which of region to link the cursor to in the instance that regions overlap.

Claim 11

Claim 11 recites:

A computer-readable medium storing computer-executable instructions to receive a GUI comprising a GUI parent having GUI children, the GUI children having positions within the GUI parent, and to divide the GUI parent into container level, linking sectors based on the positions of the GUI children within the GUI parent wherein the linking sectors provide for linking to the GUI parent and/or the GUI children.

Applicant respectfully directs the Office to the argument and evidence for claim 7 and submits, for at least the same reasons, that claim 11 is patentable over the Gayraud reference in view of the HTML document.

Claim 18

Claim 18 recites, in part:

dividing a GUI parent, having GUI children, into linking sectors; mapping each of the GUI children to at least one of the sectors; linking a cursor to one of the GUI children using the mapping; and painting one of the GUI children based on the linking.

Applicant submits that the Gayraud reference does not disclose the subject matter of claim 18. In particular, the Gayraud reference does not disclose linking sectors, mapping a GUI child to at least one sector or linking a cursor to a GUI child using the mapping. Applicant refers to the foregoing discussion of the Gayraud reference for support of Applicant's position and Applicant submits that claim 18 is patentable over the Gayraud reference.

Rejections under 35 U.S.C. §103(a): Gayraud in view of Thompson

The Office rejected claims 12-17 under 103 as being unpatentable over the Gayraud reference in view of Thompson et al. (US Pub. No. 2003/0041070), referred to herein as the Thompson reference.

Claim 12 recites:

dividing a GUI parent associated with an operating system into operating system sectors; and

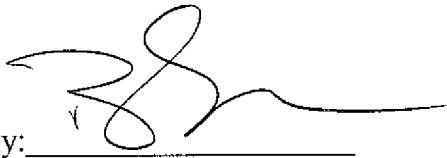*dividing a GUI parent associated with a framework into framework. linking sectors.*

As already discussed, the Gayraud reference does not disclose or teach sectors or use of sectors. The Gayraud reference discloses use of functional constructs, e.g., operating system controls. Sectors allow for enhanced performance as shown in the trials (see, e.g., Table 5 and Table 6). Claim 12 recites operating system sectors and framework sectors. Such sectors serve to enhance performance and are not of themselves GUI items (e.g., children and/or parents). Claims 13-17 depend on claim 12 and are believed patentable over the Gayraud reference for at least the same reasons as claim 12.

Conclusion

Pending claims 1-18 are believed to be in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the subject application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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